

United States District Court	DISTRICT of ARIZONA
United States of America v. Mona Lynn Raab DOB: 1966; United States Citizen	DOCKET NO. 19-04629 MJ
MAGISTRATE'S CASE NO.	
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)	

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about July 29, 2019, at or near Benson, in the District of Arizona, **Mona Lynn Raab**, knowing and in reckless disregard of the fact that certain illegal aliens, Sergio Librado-Garcia, Efren Ortega-Cruz, Edgar Ortega-Cruz, and Araceli Sanchez-Gutierrez, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain, and placing in jeopardy the life of any person; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii)**.

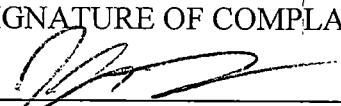
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about July 29, 2019, at or near Benson, in the District of Arizona, United States Border Patrol Agents (BPA) observed a white Hyundai Sonata traveling northbound near the SR-90 checkpoint with a female driver and male passenger. Both displayed an exaggerated posture upon seeing a marked Border Patrol vehicle. The checkpoint was closed. BPA also observed a temporary license plate. Record checks revealed the vehicle was registered to an address out of Phoenix with no prior crossings through any other checkpoint. BPA drove alongside the Hyundai Sonata and observed "bulky objects beneath the window of the vehicle." The driver drove approximately 25 mph below the posted speed limit. BPA initiated a vehicle stop and identified the driver as **Mona Lynn Raab** and an adult male front seat passenger, both United States Citizens. BPA observed four individuals laying down in the back seat. Five rear passengers were encountered, including one in the trunk. BPA determined that all five were passengers were in the United States illegally.

Material witnesses Librado and Sanchez stated that they had made arrangements to be smuggled into the United States for money. Efren Ortega and Edgar Ortega stated that a friend had made the smuggling arrangements on their behalf. Librado stated he crossed the International Boundary Fence and was guided via cell phone to the highway. Librado stated he was picked up and taken to a hotel room. After 10 minutes, a white car arrived which was occupied by a female driver, later identified as **Raab**, and a male passenger. Librado stated he was told they were traveling to Phoenix and they did not make any stops until they were arrested by BPA. Sanchez stated she crossed by herself and walked to an unfinished paved road. Sanchez stated she observed a white vehicle stop and the driver got out and opened the back passenger door. She ran to the vehicle and got in. Sanchez stated they stopped at a gas station first and then stopped at a hotel where they picked up four other subjects. Sanchez stated the driver told her to duck down if she saw BPA. Efren Ortega and Edgar Ortega stated they were dropped off at a hotel room by **Raab** and the passenger. They both stated that they were picked up by **Raab** and the passenger three hours later.

Continued on back.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Sergio Librado-Garcia, Efren Ortega-Cruz, Edgar Ortega-Cruz, and Araceli Sanchez-Gutierrez

Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT 
AUTHORIZED BY: AUSA CHR/JJO <u>fmk/for/</u>	OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE July 30, 2019

1) See Federal rules of Criminal Procedure Rules 3 and 54

Continued from front.

The passenger Eduardo Roberto Bitia-Lopez stated he crossed the IBF and walked for nine hours until he arrived in Sierra Vista. Bitia stated he was taken to a hotel room where he stayed one night. The following afternoon, Bitia stated a vehicle with a female driver arrived to take him to Tucson. The driver told him to get ready and that she would return for him shortly. Once she returned, she knocked on the door and told him "Let's go." Bitia stated the driver told him to get into the trunk. Bitia stated he was in the trunk for one and a half hour to two hours until he was arrested by BPA.

In a post-*Miranda* statement, **Raab** stated that the registered owner of the Hyundai Sonata offered her money to transport people from Sierra Vista to Phoenix. **Raab** stated that she was to be paid \$1,000 USD. **Raab** stated that one individual had to get in the trunk of the vehicle.